

## MAZIE SLATER KATZ & FREEMAN, LLC

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April 24, 2023

### **VIA ECF**

Honorable Robert Kugler, U.S.D.J.  
U.S. District Court - District of New Jersey  
Mitchell S. Cohen Building & US  
Courthouse  
1 John F. Gerry Plaza, Courtroom 4D  
4th and Cooper Streets  
Camden, New Jersey 08101

Honorable Thomas I. Vanaskie (Ret.)  
Special Master  
Stevens & Lee  
1500 Market St., East Tower, Suite 1800  
Philadelphia, Pennsylvania 19103-7360

Re: ***In re Valsartan, Losartan, and Irbesartan Liability Litigation,***  
**Case No. 1:19-md-02875-RBK (D.N.J.)**

Dear Judge Kugler and Judge Vanaskie:

Please accept this letter on behalf of Plaintiffs in advance of the April 26, 2023 case management conference.

### **1. Retailer and Wholesaler Defendants' Objections to CMO 32**

On April 24, Retailer Defendants' counsel asked to meet and confer to gain "clarification" on the supplemental discovery Plaintiffs sought by way of their trial proposal letter, which the Court largely granted by its April 21 order. Wholesalers then notified Plaintiffs that they had objections to CMO 32 as well. Plaintiffs believe what they sought and what the Court ordered was very discrete and very clear with respect to both groups of defendants. Nonetheless, Plaintiffs will

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attempt to meet and confer with Retailers and Wholesaler Defendants before the upcoming CMC and, in all events, will be prepared to address this issue as necessary during the CMC.

**2. PFS Deficiencies and Orders to Show Cause**

Plaintiffs will be prepared to address this issue during the conference.

Respectfully,



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ADAM M. SLATER

Cc: All counsel of record (via ECF)